

Remarks

Claims 1-85 were pending in the present application. New claims 86-102 have been added by this Supplemental Response. No new subject matter has been added. It is respectfully submitted that the pending claims define allowable subject matter.

Claim 86 concerns a portable medical radiopharmaceutical administration system having, among other things, a moveable structure mounted on wheels, a multi-dose container, a dispensing station and a dose calibrator. The multi-dose container and dispensing station are coupled to one another through a liquid transfer line. The multi-dose container, dispensing station, dose calibrator and liquid transfer line are enclosed within the radioactivity shielding on the moveable structure. The prior art fails to teach or suggest any such structure.

As recognized in the prior Office Action, Reilly and Hamadeh fail to teach the use of wheels. The Office Action maintains that it would have been obvious to mount Reilly's apparatus on wheels. An absence of wheels is not the only deficiency of Reilly and Hamadeh. Among other deficiencies, Reilly and Hamadeh do not enclose a multi-dose container, dispensing station, dose calibrator and liquid transfer line all within radioactivity shielding on a common structure, mobile or otherwise. As clearly shown in Figure 4C, Reilly uses a stationary cabinet stand 300, to which container 44 and dose calibration unit 200 are mounted in separate locations. The tubing, that runs between the container 44 and the unit 200, clearly is exposed and outside of any type of shielding, and thus would emit radioactivity to the surrounding environment.

It is illogical and without sound reason, to suggest that the person of ordinary skill would deem it desirable to mount Reilly's stand 300 on wheel in order to move it between PET systems **which would necessarily move throughout the hallways and examination areas of a hospital**. Doing so would expose hospital patients, visitors, nurses and physicians to radioactive emissions at least from the unshielded portions of Reilly's apparatus. This is clearly contrary to safe medical practices. Instead, it is submitted that Reilly's cabinet stand 300 is stationary for a

purpose, namely to be maintained in a controlled and isolated location secure from hospital patients, visitors, nurses and physicians.

Further, it is submitted that claim 26 (already pending) is patentable over the prior art for reasons of record and for the reasons set forth above in connection with claim 86. Claim 26 clearly requires that a radioactivity shield surrounds portions of the medical radiopharmaceutical administration system that are radioactive, and that the shield is mounted on wheels. As explained above, it would be contrary to sound medical practices to mount Reilly's stand 300 on wheel in order to move it between PET systems through the hallways and examination areas of a hospital. Reilly's apparatus includes limited shielding and Reilly's stand is NOT mobile for a reason.

In view of the foregoing comments, it is respectfully submitted that the prior art fails to teach or suggest the claimed invention. Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the telephone number listed below.

Respectfully Submitted,



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